

UNITED STATES FEDERAL COURT
DISTRICT OF NEW JERSEY

Daniel M. Risis
19 Fordham Road
Livingston, NJ 07039
(307) 388-9165

Case No: 23-cv-03428
Judge: Salas

**EMERGENCY ORDER TO SHOW
CAUSE TO VACATE JUDGMENT
AGAINST DANIEL RISIS
(AND ALL RELATED COMPANIES WITH
THAT DANIEL RISIS HAS ANY
OWNERSHIP/INTEREST)**

THIS MATTER being brought before the court by Daniel M. Risis, Pro Se, on behalf of PLAINTIFF, Daniel Risis, both individually and derivatively on behalf of all of his LLC's, corporations, companies, trademarks, collateral, property, copyrights and patents, Is seeking relief by way of order to show cause with temporary restraints; and it appearing that Defendant(s) has notice of this application; and for good cause shown.

It is on this ____ day of AUGUST, 2023:

ORDERED, to immediately vacate Judgment against Daniel Risis, both individually and derivatively; including all of his LLC's, corporations, companies, trademarks, collateral property, copyrights and patents,

AND IT IS FURTHER ORDERED, that PB Financing and Oleg Neivestny must show evidence and efforts of collecting the debt from the owner of Daniel Markus Inc. dba Perfect Pawn, Margarita Risis, as she is the principal debtor.

AND IT IS FURTHER ORDERED, that on and for the record, that Daniel M. Risis was never an owner of Daniel Markus Inc. dba Perfect Pawn

AND IT IS FURTHER ORDERED, that a full accounting breakdown is produced to the Plaintiff and the Courts, that indicates the principal balance, interest, and any and all *legal expenses* which encompass the alleged debts.

AND IT IS FURTHER ORDERED that Defendant appear and show cause before this Court at the Essex County Courthouse in Newark, NJ at _____ o'clock in the _____ or as soon thereafter as counsel can be heard, on the _____ day of _____, 2023 why an order should not be issued as follows:

A. Ordering an immediate STAY in the default Judgements against Daniel M. Risis personally until the conclusion of the trial in accordance with the rights of every human to have a fair and balanced trial. *(A fair trial is a trial which is "conducted fairly, justly, and with procedural regularity by an impartial judge".^[1] Various rights associated with a fair trial are explicitly proclaimed in Article 10 of the Universal Declaration of Human Rights, the Sixth Amendment to the United States Constitution, and Article 6 of the European Convention of Human Rights, as well as numerous other constitutions and declarations throughout the world.)*

Plaintiff has had reasonable time to;

1. Receive Accounting from US Trustee Donald Biase
2. Receive Accounting from Oleg Neivestney
3. Receive Accounting from PB Financing
4. Receive Accounting from Timothy Duggan
5. The completion of the fee hearing for my personal bankruptcy case
6. Discovery demands are complete
7. Interrogatories are complete
8. Depositions of defendants are complete

B. Granting such other relief as the court deems equitable and just.

AND IT IS FURTHER ORDERED that:

1. The Defendant may move to dissolve or modify the temporary restraints herein contained on two (2) days' notice to Daniel M. Risis, Pro Se.
2. A copy of this order to show cause and supporting papers were served on Plaintiff by eCourts, Email, and Regular Mail and Certificated Mail, Return Receipt Requested.
3. Plaintiff shall file and serve a written response to this order to show cause and the request for enter of injunctive relief and proof of service by _____, 2023.
4. Defendant must file and serve any written reply to Plaintiff's opposition to the order to show cause by _____, 2023.
5. If Defendant(s) does not file and serve opposition to this order to show cause, the application will be decided on the papers on the return date and relief may be granted by default, provided that Defendants file a proof of service and a proposed form of order at least two (2) days prior to the return date.
6. If the Defendants have not already done so, a proposed form of order addressing the relief sought on the return date (along with a self-addressed return envelope with return address and postage) must be submitted to the court no later than two (2) days before the return date.
7. The court will entertain argument, but not testimony, on the return date of the order to show cause, unless the court and parties are advised to the contrary no later than _____ days before the return date.

Esther Salas JSC

DATED: